



FARMINGTON CITY

H. JAMES TALBOT
MAYOR

BRETT ANDERSON
DOUG ANDERSON
JOHN BILTON
BRIGHAM N. MELLOR
CORY R. RITZ
CITY COUNCIL

DAVE MILLHEIM
CITY MANAGER

August 29, 2017

To: Randy Jeffries, UDOT Project Manager, West Davis Corridor

Subject: Farmington City Input
West Davis Corridor Environmental Impact Statement

Dear Randy:

We have all come far in this EIS process. It has not been an easy process but we are happy with the progress made as a result of our considerable study, multiple meetings with yourself and other UDOT officials, legislators, consultants, residents, etc., over the last several years. No one can say the process has not provided ample opportunity for comments. Your cooperation and professionalism is much appreciated and respected. Please consider the following pages Farmington City's additional comments regarding the multi-volume June 2017 Final Environmental Impact Statement. Rather than rehash all the issues raised in the past, and to bring some order to the following comments, I am going to cite the June 2017 EIS document on a section by section basis for the specific comments we are raising so that you can tie these comments to the EIS.

Due to the limited city resources we cannot continue to throw at this study and my limited expertise in many of the subject areas of the EIS, I am going to address only those issues that Farmington City still believes need additional consideration and/or should be noted prior to the Record of Decision. These comments are in no order of priority. These comments are made after receiving considerable input from my Mayor and City Council.

Respectfully submitted

Dave Millheim
City Manager

Cc: City Council

ADDITIONAL COMMENTS SUBMITTED BY FARMINGTON CITY

1.6.1 Farmington City is very pleased that a new I-15 interchange at Shepard Lane is now on the WFRC RTP 2015-2040 Projects List as a Phase 1 project. That interchange is critical to the regional mobility challenge we are all trying to address as well as preventing failures at the I-15/Park Lane/US 89 interchange complex.

1.6.1 We disagree that the new construction for the Shepard Lane Arterial connecting I-15 to the WDC should be classified as a Phase 2 priority. This should be a phase one priority. If the primary reason for the construction of the WDC is to relieve I-15 congestion (regional mobility) due to the growth in western Davis and Weber Counties, this arterial connection is critical to that goal. Without that arterial connection and the large gaps in interchanges on the southern end of the WDC, whenever there is an accident on either those portions of the WDC or the parallel portions of I-15 the delays both routes will have to endure will be more than significant. This arterial linkage provides a relieve valve (at the closest point of connection) to both the WDC and I-15 which will be needed in many situations. It should be classified in the EIS as a Phase 1 priority and made a state route. Farmington is currently working with UDOT, state legislators, Kaysville and Davis County officials towards that end. Multiple places in the EIS, it refers to the funding responsibility for the arterial falling to Farmington and Kaysville. We disagree with that assumption since it will become, immediately upon completion, a regional mobility route used by multiple users throughout the EIS study area.

1.6.1 We also want the description of the new Shepard Lane arterial to be four lanes, not two. We do not believe a four lane arterial is warranted to be built at this time. The City would only be recommending construction of a two lane road, with a center turn lane in the short term. Nevertheless, we see the need for a four lane road in the future and believe we should design and plan for that likelihood now while the majority of the ROW is already publicly owned. This would be accomplished through oversized landscape strips on both sides of the new arterial which would allow for future widening when the traffic counts warrant such.

2.3.7.1 We are very supportive of the proposed trail crossing of I-15 on Park Lane. While that design is not completed, the EIS notes it would be done such that it would include a bridge expansion of the existing structure over I-15 to accommodate the trail. Three points deserve special note. The first is the design should be such that the width can safely accommodate both pedestrians and bike riders in the same space. The second is if the expansion of the bridge does not include the abutting US 89 overpass, little is accomplished in terms of improved safety for bicyclists and pedestrians. Without the trail addition continuing over the US 89 portion, we believe this will increase the risk to pedestrians and bicyclists as it will give them a false sense of security that they have space to safely get over both abutting overpasses when in fact, they would only transit one (I-15) and then be trapped between I-15 and US 89. While these are two overpasses, they should be viewed as one structure since they are so closely tied together from a traffic standpoint. The last point is please do not discount the possibility that UDOT may wish to construct the pedestrian/bike facility as a free standing bridge and not just an

expansion of the existing deck. This would improve safety as it would remove the competition and conflicts with the multiple signal lights over the interchange complexes.

2.3.8.2 Farmington City does not want billboards along any portions of the WDC. We have begun discussions with other cities along the proposed route and are moving forward with attempts to receive a scenic byway designation and enhance local ordinances prohibiting billboards along the WDC.

2.4.2 Table 2-12: Three unrelated comments on this table. The first comment might be better made in other sections of the EIS but we have chosen to make it here. We note the "Freeway to Freeway" interchange from I-15 to WDC at the southern end of this project. We all understand this is only freeway to freeway at this location and provides no local access. We question the wisdom of the significant taxpayer cost versus the minimal benefit of the southbound WDC to northbound I-15 movement at this location. We believe the flyover(s) required to make this work will be in the tens of millions for the very few cars and trucks we believe will make this traffic movement on a daily basis. This is similar to the northbound I-15 movement to southbound I-215 near the oil refineries where that traffic movement does not exist and is not needed. We are also very concerned of the significantly high flyovers that will be required to make this traffic movement work in the impacts to the local residents when they provide very little beneficial use.

The second issue affects Farmington and Centerville. We believe it is a mistake to cul-de-sac the Davis County Road labeled as approximately 700 West. Since the WDC is already proposed to overpass both Tippetts Lane (650 West) and the nearby rail lines, the WDC should continue the overpass for the Davis County Road at approximately 700 West. Both Centerville and Davis County want a north/south arterial west of I-15 and Legacy. Farmington is supportive of such a north/south arterial connection but it has not been a high priority for the City, but may be in the future. It is unclear whether this connection will be made at Tippetts Lane or the Davis County Road due to a variety of concerns. Both have merit for such a connection and the cul-de-sac for the Davis County Road would be a mistake. The cost/benefit analysis of extending the overpass would clearly warrant the small additional expense.

Lastly, the Weber Basin Water District in conjunction with the largest water districts in the State is planning a very large water pipeline (Bear River Pipeline Project) to run through multiple cities along the western fringes of Weber, Davis and Salt Lake Counties. We find it very surprising that we could find no mention of this project in the EIS since it is such a regional significant project paralleling the route of the WDC and has been in the planning stage for many years. The west side of WDC would provide a natural ROW corridor for this pipeline project without potentially condemning hundreds of homes and businesses in the future. The Davis County Road slated for a proposed cul-de-sac would be a perfect location for such a pipeline and the Water District is studying this ROW possibility. An overpass over this route would preserve that option for the many affected cities in multiple counties, the Water District and provide the north/south linkage between Centerville and Farmington if the Tippetts Lane (650 West)

option were not to be constructed. In any scenario, the Tippetts Lane option will have a WDC overpass or face land locking numerous homes and businesses in Farmington.

The second comment related to this table is we believe a footnote should be added to the 1525 West street as follows: "Farmington City supports the recommended cross over street at 1525 West but sees the need for a future interchange at this location which is not warranted at this time. The City will be taking all steps needed to preserve abutting ROW for a future interchange in its planning and development process as opportunities present themselves. The City wants UDOT to include the future ROW design footprint of this interchange so that it can assist with future planning efforts in the area." We view this future 1525 interchange site as more favorable than the 1100 West site as shown on our current transportation masterplan. The primary reason for this change is the configuration of the 1100 West site as affected by the WDC makes a future interchange very challenging at that location and more viable at 1525 West.

2.4.2 We question why the grade separated crossings for the D&RGW Trail in Farmington, Kaysville and Layton are mentioned and that those trail improvements would be constructed if there is local support and funding. Further clarification on this one is needed in the EIS. If UDOT is proposing to build these improvements as mitigation for the WDC, then the State should be paying for those improvements, not the respective cities. Farmington would be supportive of such crossings but cannot commit funding for the same at this time. If such improvements were decided to be necessary now or in the future, Farmington City does not see how UDOT has any jurisdictional authority for such so mentioning this in the EIS as a proposed mitigation at city expense leaves us a little confused.

3.3.5.2 This section should be corrected to state the new 14,000 sf visitor and education center is under current construction and should open within a year.

3.4.3 Table 3-3 Farmington wants it noted that this table clearly demonstrates that Farmington City has the largest impacts to land use of any City along the proposed WDC route as a percent of our total land area within the City affected by the WDC.

3.4.3.1 We think there is a mistake in the reporting of these numbers. This section says 168 acres of conservation easements are affected by the WDC. Farmington alone has 422 acres of conservation easements the WDC is proposed to bisect and destroy through condemnation. If the reporting is only for actual ROW of the WDC, the 168 acre number may be correct but is very misleading as to the impacts. The whole statutory purpose of the conservation easements is to create open space and restrict development. The construction of the highway does neither and is expressly prohibited as a condition of the easements. Therefore in this section titled "Impacts to Land Use", the total acreage of the bisected conservation easements should be reported since they are being destroyed by the WDC and ultimately condemned by the State for the WDC. It should be noted that UDOT's early purchase of the conservation easement property in Farmington is a violation of the easement conditions and constitutes an illegal subdivision under city code and possible violation of state code. Farmington has not pursued this violation other than

notify UDOT as we believe the violation will be remedied through the yet to come acquisition process for the easements.

3.4.3.1 Table 3-5. The narrative describing consistency with the Farmington Masterplan does not tell the whole story and we want the record to note such for the benefit of our residents. While the narrative in the table is factually accurate, we have stated to UDOT on numerous occasions and in writing that the only reason the City changed its Transportation Master Plan regarding the Glovers Lane alternative in the first place, is the City was told repeatedly by UDOT officials the Shepard Lane alternative was not a viable option. The Shepard Lane resolution mentioned in the table narrative was passed by the City after an initial independent engineering study showed it to be viable. UDOT eventually acknowledged the Shepard Lane alternative was being further considered after it passed through the initial screening review. When that option came back into the EIS process for further study the City elected not to change its Transportation Masterplan back to Shepard Lane so as to not further confuse the public while the EIS process was being completed. The City intentionally withheld amending its Transportation Masterplan as we felt the resolution adequately explained the history regarding the options.

3.4.6 We understand there are "... state and federal property acquisition laws for right of way impacts to land that is included in the Farmington Ranches, Farmington Meadows and Hunters Creek conservation easements." We want it noted in the EIS that we believe based on multiple legal reviews that those guidelines require the impact and acquisition to be for the total acreage of the conservation easements and not just the specific right of way needed for construction. We will take and defend that position if the state argues that the only "take" in the acquisition process is for the specific ROW needed for the highway. We do not believe this will be the case since in numerous other places in the EIS, it refers to the mitigation measures proposed which cover the totality of the easement acreage including land UDOT already owns but that same land is encumbered by the conservation easements under Farmington's control until adjudicated.

5.5.3.1 Central Davis Sewer District Property – As we have all recently been made aware of, Farmington is very concerned of potential impacts from the WDC to the Sewer District facility which serves Farmington, Kaysville and Fruit Heights. Farmington cannot support any impacts to the facility which results in long term rate increases to our residents caused by the highway construction. Based on data provided to the three affected cities and UDOT at a meeting held on August 23, 2017, the cost of the required operational changes could be between \$70-100 million which is significant in any analysis. Farmington would support moving the proposed alignment to the west out of the areas currently being used for Sewer District operations. We would also support moving the proposed alignment to the east so long as no additional homes are condemned and operational impacts do not result in future additional costs to our residents. We do not support trucking of the sludge off site as that is problematic and costly and might jeopardize the favorable grandfather provisions the site currently enjoys in a highly regulated environment which option would in the end likely result in higher costs to our residents and others serviced by this facility.

5.5.5.3 We agree with the location of the mitigation measure for the 1100 West Park to be relocated as required under Section 4(f). We understand the logic of why UDOT picked this mitigation location for this park.

7.4.4.2 Tables 7-9 and 7-14: Park Lane congestion times (on an already difficult interchange complex) go up significantly under A1, A2, B1 and B2. We believe this data is accurate and should cause concern for one of the largest interchange complexes in the State. The congestion times reduce on almost all other listed east-west corridors which we believe further documents the need for a new state route at Shepard Lane connecting I-15 and the WDC. Without such an arterial connection, we believe we will see an accelerated deterioration of the Park Lane/I-15/US 89 complex being caused by the construction of the WDC. This complex has in the past and will again cause backups onto I-15 which must be avoided at all costs due to the ripple effects this causes in the transportation system.

10.4.6 We believe a simple omission was made on the list of trail crossings for A1, A2, B1 and B2, and B2 where each should include a grade separated crossing for the Farmington Creek Trail. We assume with this would be accomplished with a box culvert large enough to accommodate the creek and pedestrian use in a safe manner. In 10.3.3, Table 10-1 the Farmington Creek Trail is properly identified so we believe it should be included in 10.4.6

18.5.3.1 Nighttime lighting -- We want to emphasize our support for nighttime lighting fixtures such that those will minimize nighttime lighting except where those are deemed necessary.

Noise Barriers – We have already commented on this issue under separate emails. The City wishes to follow the control guidelines as already existing for sound barriers which means taking a neutral position unless the overwhelming majority of those directly affected elect to have the sound walls. Besides sound, we believe the view corridors of the open space on our west side are very important to our residents and are concerned that additional sound walls would negatively impact those view corridors.

20.3.10.3 In various places throughout the EIS, it is noted that a new High School is being built in Farmington and the WDC will not impact the High School. We hope those statements are true, especially during construction. We want all construction access for the WDC in the southern section to come off of the existing Legacy Highway since this will be the least impactful to local residents and not create safety problems for the High School which opens in 2018. Farmington will not support construction access off of 650 West or Glovers Lane.

26.2 We understand UDOT is planning to provide compensation for "...right-of-way impacts to land included in the Farmington Ranches, Farmington Meadows and Hunters Creek conservation easements." As stated earlier, compensation for only the right of way will not suffice since the easements are being destroyed by the Highway. We expect the

valuation to be for the totality of the easements since they were created, not for the WDC, but as a united perpetual open space area serving a variety of purposes.

26.4.5 If the arterial road connection to be located for the 950 North interchange is not built at the same time as the WDC, the access promise made in this section for emergency vehicles with primary responsibility for response cannot be kept by the State. Farmington would have jurisdiction for those portions of the WDC coming through Farmington yet we would have no access for police, fire protection and ambulance services except through a very delayed response I-15 at Park Lane circling back via Glovers Lane or north of the 950 North interchange in Kaysville. This will result in response times well below nationally recognized standards which is unacceptable and puts public safety at risk. The solution to this challenge is to build the Shepard Lane connector in conjunction with the Shepard Lane overpass already slated for construction separate from the WDC project. Kaysville City also wants a frontage connection from the north and east of the 950 North interchange to that interchange. Farmington City would support such a connection for Kaysville as it would also aid in public safety access to the WDC from both Kaysville and Farmington.

27.4.2 Table 27-5 We do not understand why the Bus Park located at 400 West Glovers Lane is considered a 4f park since it is not impacted any of the proposed routes of the WDC.

27.4.4.2 The City respectfully disagrees with the interpretation of FHWA regarding the conservation easements and their 4F status. Nevertheless, we accept the inevitability of the construction of the WDC. We have put in abeyance our disagreement with the FHWA interpretation so long as the conservation easements are valued for their full acreage through the required acquisition and adjudication process.

27.6.3 1100 West Park: We understand this is a 4F property and support the location UDOT has determined for mitigation since it is the best solution for reasons stated elsewhere in the EIS. We appreciate the sentence, "UDOT would buy as much of parcel 080760010 as necessary to adequately replace the recreational amenities and function lost at the 1100 West Park." We want to point out that this cannot be an acre for acre mitigation due to the important differences in the two sites. When we situated the 1100 West Park a few years ago, we choose that specific location for two very important reasons. The first is we were able to place the park at the corner of two arterial roads (Glovers Lane and 1100 West) thus lowering the space we would need for parking within the actual park space by using the arterial streets for additional parking. The second reason is we partnered with the Davis School District through a maintenance agreement such that we could also use their parking lots and play fields thus providing greater functionality for the park space we developed. Both of these benefits we enjoyed at the 1100 West Park will be lost at the mitigation site and so want it noted the mitigation acreage must account for these losses in functionality. We will work with UDOT staff in making those necessary determinations.